

EXHIBIT A

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
<p>“a communications, command, control and sensing system for communicating with a plurality of external devices comprising.”</p> <p>All asserted claims</p>	[AGREED]	[AGREED]	<p>Preambles of independent claims 1 and 34 are substantive limitations and the clause “communications, command, control and sensing system” in each such preamble does not need to be further construed.</p>
<p>“external device”</p> <p>All asserted claims</p>	[AGREED]	[AGREED]	<p>A device separate from the handset and the base station.</p>
<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets”</p> <p>Claim 1</p>	[AGREED]	[AGREED]	<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by said microprocessor so as to recreate, by the microprocessor, a desired command code set, such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets”</p>
<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by</p>	[AGREED]	[AGREED]	<p>“a memory device coupled to said microprocessor configured to store a plurality of parameter sets retrieved by</p>

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
<p>said microprocessor so as to recreate based on said parameter sets a desired set of pulse signals corresponding to logical “1’s” and “0’s” as specified by a command code set”</p> <p>Claim 34</p>			<p>said microprocessor so as to recreate, by the microprocessor, based on said parameter sets a desired set of pulse signals corresponding to logical ‘1’s’ and ‘0’s’ as specified by a command code set”</p>
<p>“a command code set that defines the signals that are employed to communicate with each one of said external devices”</p> <p>All asserted claims</p>	[AGREED]	[AGREED]	Plain and ordinary meaning
<p>“parameter sets”</p> <p>All asserted claims</p>	[AGREED]	[AGREED]	Plain and ordinary meaning
<p>“a microprocessor for generating a plurality of control signals used to operate said system, said microprocessor creating a plurality of reprogrammable communication protocols”</p> <p>All asserted claims</p>	<p>“a microprocessor configured to generate a plurality of control signals used to operate said system and configured to create a plurality of [reprogrammable] communication protocols” as construed by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-</p>	<p>“a microprocessor configured to bring into existence two or more control signals used to operate said system and configured to bring into existence two or more [reprogrammable] communication protocols”</p>	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
	cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155).		
<p>“a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals”</p> <p>Claim 2</p>	<p>“a selector controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as selected by a user, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals” as construed by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36; Dkt. # 155).</p>	<p>“a multiplexer/demultiplexer controlled by said microprocessor for enabling said radio frequency transceiver and said infra-red frequency transceiver to transmit a desired command code set generated by said microprocessor via either radio frequency signals and infra-red signals as desired, and to receive a signal from any one of said external devices via either radio frequency signals and infra-red signals”</p>	
<p>“a communication protocol”</p> <p>All asserted claims</p>	<p>Plain and ordinary meaning, as set out by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. # 108 at 42-45; Dkt. # 155).</p>	<p>“a defined set of rules and formats that allows devices to communicate with each other”</p>	
<p>“a plurality of control signals”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at</p>	<p>“two or more control signals”</p>	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
	15-22; Dkt. # 155), plain and ordinary meaning.		
<p>“a plurality of reprogrammable communication protocols”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155), plain and ordinary meaning.</p>	<p>Indefinite. Protocols cannot be reprogrammable.</p> <p>Defendants and Intervenor provide an alternative construction for this term based on what a reprogrammable communication protocol might be if such a protocol existed: “two or more communication protocols whose rules and formats can be changed through programming”</p>	
<p>“such that the memory space required to store said parameters is smaller than the memory space required to store said command code sets”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.</p>	<p>Indefinite.</p>	
<p>“creating; create”</p>	<p>To the extent not covered by this Court's construction in</p>	<p>“[bringing / bring] into</p>	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
All asserted claims	<i>Salazar v. HTC Corp.</i> , 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155; Dkt.# 250 at 8-9), plain and ordinary meaning.	existence”	
“generating; generated; generate” All asserted claims	To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i> , 2:16-cv-01096-JRG (Dkt. #108 at 15-22; Dkt. # 155; Dkt.# 250 at 8-9), plain and ordinary meaning.	“[bringing / brought / bring] into existence”	
“recreate” All asserted claims	To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i> , 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.	“bring something back into existence”	
“a desired command code set” All asserted claims	To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i> , 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155), plain and ordinary meaning.	“a different command code set than the command code set that defines the signals that are employed to communicate with each one of said external devices” If this term is not given this meaning, it is indefinite for lacking antecedent basis.	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
<p>“a microprocessor for generating . . . , said microprocessor creating . . . , a plurality of parameter sets retrieved by said microprocessor . . . , said microprocessor generating . . .”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 15-30; Dkt. # 155; Dkt. # 250 at 8-9), plain and ordinary meaning.</p>	<p>“one or more microprocessors, each of which must perform the generating, creating, retrieving, and generating functions”</p>	
<p>“selector”</p> <p>Claim 2</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36; Dkt. # 155), plain and ordinary meaning.</p>	<p>“a multiplexer/demultiplexer”</p>	
<p>“said microprocessor generating a communication protocol in response to said user selection”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 42-46; Dkt. # 155; Dkt. # 250 at 7-8), plain and ordinary meaning.</p>	<p>“said microprocessor generating a communication protocol different from the reprogrammable communication protocols”</p> <p>If this term is not given this meaning, it is indefinite.</p>	
<p>“an infra-red frequency transceiver coupled to said microprocessor for</p>	<p>To the extent not covered by this Court's construction in <i>Salazar v. HTC Corp.</i>, 2:16-</p>	<p>“for each of the two or more external devices, the infra-red frequency transceiver must be</p>	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
<p>transmitting to said external devices and receiving from said external devices, in accordance with said communications protocols”</p> <p>All asserted claims</p>	<p>cv-01096-JRG (Dkt. #108 at 31-36, 42-46; Dkt. # 155; Dkt. # 250 at 6-7), plain and ordinary meaning.</p>	<p>capable of both transmitting to that device and receiving from that device, in accordance with said communications protocols”</p>	
<p>“a radio frequency transceiver...in accordance with said communication protocols”</p> <p>Claim 2</p>	<p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 31-36, 42-46; Dkt. # 155; Dkt. # 250 at 6-7), plain and ordinary meaning.</p>	<p>“the radio frequency transceiver must transmit and receive signals in accordance with the same protocols as used by the infra-red frequency transceiver of claim 1”</p>	
<p>“a sound and data coupling device adapted to receive sound as data signals”</p> <p>Claim 7</p>	<p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155; Dkt. # 250 at 3-5), plain and ordinary meaning.</p>	<p>“a device adapted to receive sound as data signals, excluding voice”</p>	
<p>“configured to”</p> <p>All asserted claims</p>	<p>To the extent not covered by this Court’s construction in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. #108 at 22-30; Dkt. # 155; Dkt. # 250 at 3-5), plain and ordinary meaning.</p>	<p>“a particularized arrangement of the memory device for a specific purpose”</p>	

Term	Plaintiff's Construction	Defendants' and Intervenor's Construction	Court's Construction
<p>“said communications protocols”</p> <p>All asserted claims</p>	<p>Plain and ordinary meaning, as set out by this Court in <i>Salazar v. HTC Corp.</i>, 2:16-cv-01096-JRG (Dkt. # 108 at 42-45; Dkt. # 155; Dkt. # 250 at 7-8).</p>	<p>Indefinite.</p>	